Headquarters U.S. Air Force

Integrity - Service - Excellence

Air Permit Compliance

HQ AFCEE/JA

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Title V Permit Compliance

- **Who is required to have a Title V permit**
  - **Any source that has the potential to emit (PTE) or actually emits more than 100TPY of any of the criteria pollutants (CO, NOx, SO_2,PM_{10}, VOC, O_3, Pb)**
  - **HAPS 10/25 TPY**
  - **Threshold is lower in certain Non Attainment areas**
  - **Applicable Statutes and Rules**
    - **42 U.S.C. §§ 7661-7661f**
    - **40 CFR Parts 70 & 71**
    - **State implementing Statutes and Regulations**
    - **Local Air Districts**

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Title V Compliance Requirements

- **Major source facilities are required to obtain federally enforceable operating permits**

  Permits have a five-year term and must be signed by the Wing CC

  A compliance certification from the Wing CC must be submitted annually to the permit issuing authority to ensure each term and condition of the permit has been met

  Emissions fees of $25 per ton of emissions per year up to 4000 tons apply annually

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Title V Compliance Requirements (Cont'd)

Bases that have not complied with all state permitting requirements must include a compliance schedule as part of the permit application

Diligent monitoring of emissions and record keeping is necessary to ensure that major source facilities operate IAW permit requirements

- **Major source facilities are also required to comply with National Emission Standards for Hazardous Air Pollutants (NESHAPS) to reduce hazardous air pollutants at the facility**

Federal Enforceability Issues

- If a source meets the definition of a Major Source, it must get a Title V Permit
- The key is limiting emissions and PTE to below the requirement to be deemed a Major Source
- Synthetic Minor
  - Limitations must be Federally Enforceable and if a source goes over the threshold then it must get a Title V permit within a year
  - Texas PI-8 Form used to certify compliance with 30 TAC § 106.6

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Major Source Guidance

- **Issued by EPA on 2 Aug 1996**
- **All Federal facilities must comply with the Clean Air Act (CAA § 118(a)) [42 U.S.C. § 7418(a)]**
- **Designed to insure consistent treatment with other Federal and Industrial facilities that must comply**
- **Why are we different?**
  - **Multiple Services on the same installation without commander control**
  - **More like a town, than a factory**
  - **Everything lumped into the same SIC Code**

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Major Source Guidance (Cont'd)

- **Optional-State or Local Permitting Authorities do not have to follow the guidance, it is not a rule**
- **Application**
  - **CAA § 112 Air Toxics**
  - **Title I PSD and NSR programs**
  - **Title V permitting program**

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Common Control Determinations

- **Part III of the Guidance-Common Control Determinations**
  - **Applies to PSD/NSR, NESHAPS, Title V**
  - **Four Military Departments are under separate control (AF, Army, Navy & USMC)**
    - **National Guard is separate**
  - **DoD Agencies are under Common Control**
    - **DCOMS, DCAA, DIA, etc.**
  - **Leased Activities and Contract for Service Activities**
    - **When leased activities are not under control of Wing, they can be excluded**
    - **Contract for Service activities, are to be included**

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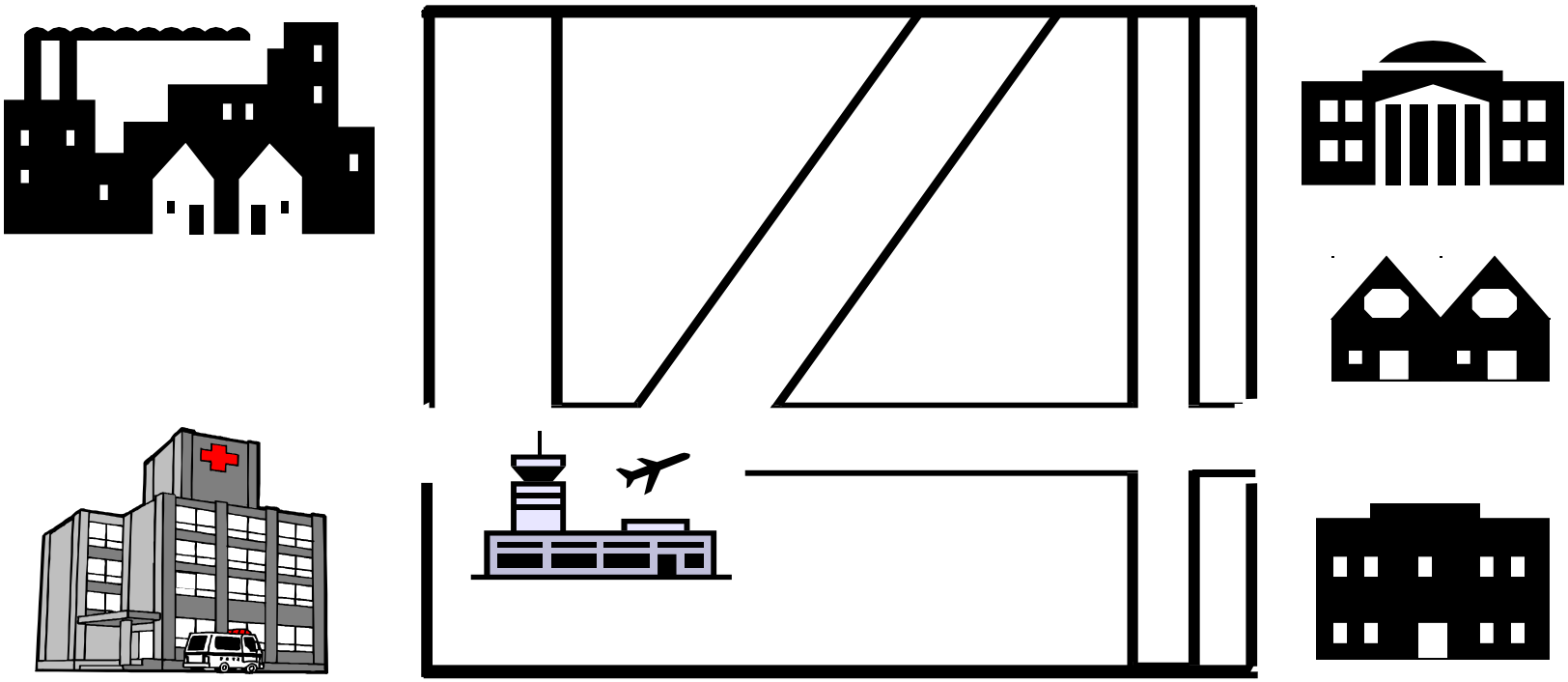
Practical Demonstration



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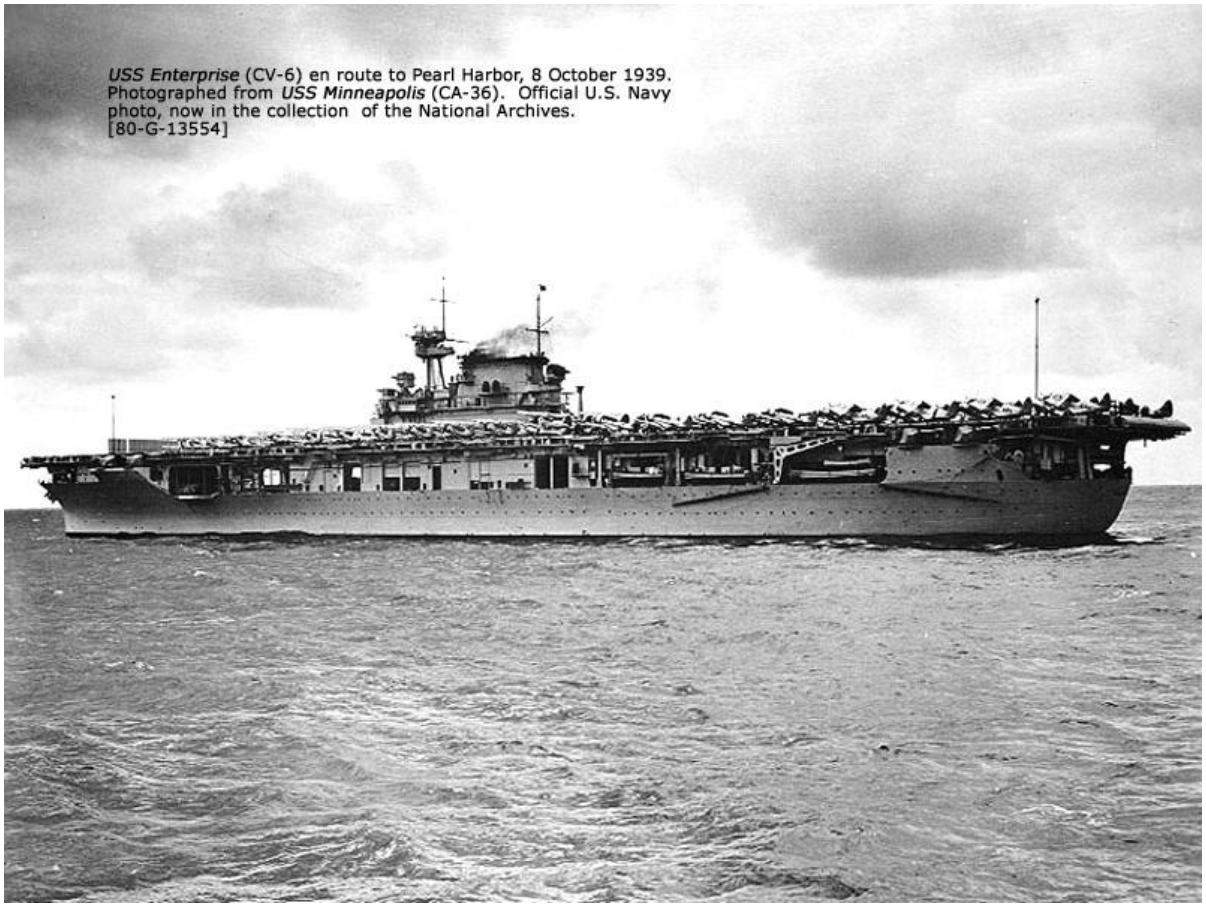
Questions



USS Enterprise (CV-6) en route to Pearl Harbor, 8 October 1939. Photographed from *USS Minneapolis* (CA-36). Official U.S. Navy photo, now in the collection of the National Archives. [80-G-13554]